EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF ILLINOIS

B.P., A MINOR, BY DAWN FRAGNOLI INDIVIDUALLY AS PARENT AND NEXT FRIEND, Plaintiffs,	) No. 13-cv-324-SCW
J.B., A MINOR, BY LINDA LEJEUNE INDIVIDUALLY AS LEGAL CUSTODIAN AND NEXT FRIEND, Plaintiffs,	) No. 13-cv-326-SCW
vs. ABBOTT LABORATORIES, INC., Defendant.	)

- C O N F I D E N T I A L -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

The videotaped 30(b)(6) deposition of ABBOTT LABORATORIES, INC. through JAMES EMBRESCIA, D.O., called for examination, taken pursuant to the Federal Rules of Civil Procedure of the United States District Courts pertaining to the taking of depositions, taken before JULIANA F. ZAJICEK, CSR No. 84-2604, a Certified Shorthand Reporter of said State of Illinois, at The Hyatt Deerfield, the Cook Room, 1750 Lake Cook Road, Deerfield, Illinois, on December 3, 2013, at 8:28 a.m.

senior management down and through our commercial organization.

Q. To fulfill the duty to patients and healthcare providers, Abbott knows it has a duty to provide the most current, accurate and complete product safety information possible about its drug products?

MR. MacWILLIAMS: Objection to form and scope.

BY THE WITNESS:

A. Is there a question? I'm sorry.

BY MR. HENDERSON:

Q. Everything I have is going to have a question mark at the end, even though it may sound like a statement.

A. Well, I didn't understand the question. I'm sorry.

Q. I'll redo.

To fulfill the duty to patients and healthcare providers, Abbott knows that it has a duty to provide the most current, accurate and complete product safety information possible about its drugs/products?

MR. MacWILLIAMS: Objection; form and scope.

BY THE WITNESS:

A. And you are asking me do I believe that?
BY MR. HENDERSON:
Q. Yes.
A. I do believe Abbott should provide accurate information, yes.
Q. The company cannot and, in fact, it must not ignore evolving scientific information that's relevant to the safety of its products?
A. Of course not.
Q. Every employee at Abbott, whether in safety or regulatory or marketing, owes the same duties to the people who buy and use your products, the same ethical duties?
MR. MacWILLIAMS: Objection; form and scope.
BY THE WITNESS:
A. I'm not sure if I understand your question. We have a code of ethics that every employee is required to review, understand and sign.
BY MR. HENDERSON:
Q. And it applies to everybody in every department regardless if it's pharmacovigilance, marketing or the janitor, correct?
A. That's my understanding, yes. I mean, I haven't looked at the list myself, but...

Q. Abbott did this because it knew it had the responsibility to do whatever reasonable tests and studies were necessary to ensure that Depakote was safe on an ongoing basis?

MR. MacWILLIAMS: Objection; form and foundation and scope.

BY THE WITNESS:

A. So we do have a responsibility to monitor the safety profile of our product and its evolution.

BY MR. HENDERSON:

Q. And if there is a test that's required, research, a clinical trial in order to ensure the safety of the drug, that's Abbott's responsibility to do it?

MR. MacWILLIAMS: Objection; form and foundation.

BY THE WITNESS:

A. Abbott is responsible for all pharmacovigilance activities for every given drug, yes.

BY MR. HENDERSON:

Q. And if -- if your pharmacovigilance give -- gives rise to a -- a signal, a safety signal, you have a duty to investigate it to determine whether

Q. Dr. Embrescia, would you agree that Abbott did have an ongoing responsibility to monitor the worldwide medical literature on the safety of valproate, Depakote?

A. Yes.

Q. From 1976, certainly through 1996, correct?

A. You said safety literature I think, didn't you, yes?

Q. Yes.

A. If -- if you said safety literature, yes, I did.

Q. And that was up to your department to handle that responsibility?

A. Again, my understanding from the people I talked to was that safety literature was monitored in the pharmacovigilance group, certainly from reporting, and then beyond that would have been shared, probably, responsibility between the scientists and the safety group.

Q. You understood that monitoring the worldwide safety literature or medical literature on the safety of Depakote was critical for the safety and well-being of your customers, people that took your

drugs?

MR. MacWILLIAMS: Objection; form and foundation.

BY THE WITNESS:

A. Well, the responsibility of the company is to monitor safety data -- safety literature to understand the drug.

BY MR. HENDERSON:

Q. And you had a responsibility to be vigilant about the safety of all drugs you marketed?

A. Of course.

Q. You knew that if information came to light about the safety profile of a drug and the company failed to provide relevant current safety information to doctors, you would certainly foresee that that might cause harm to patients who took your products?

MR. MacWILLIAMS: Objection; form, foundation and scope.

BY THE WITNESS:

A. So, again, the role of the pharmacovigilance group is to assess safety data and make it available through labeling, whatever.

BY MR. HENDERSON:

Q. And if you failed to do that, if you

teratogenicity."
BY MR. HENDERSON:
Q. Okay. So may produce teratogenicity to you, the only one way to interpret that is just to say, it may produce teratogenicity?
A. That's the way I interpret it.
Q. Okay. Abbott did, at all times it was marketing this drug, have the legal, ethical and scientific authority to conduct whatever studies it felt were appropriate to investigate the safety of this drug, would you agree?
MR. MacWILLIAMS: Objection; form, foundation and scope.
BY THE WITNESS:
A. So, again, I think I've said before, I don't conduct studies. We make -- from pharmacovigilance responsibility --
BY MR. HENDERSON:
Q. Pharmacovigilance studies.
A. We don't conduct pharmacovigilance studies. There are no such things as pharmacovigilance studies.
Q. Epidemiologic studies?
A. There are epidemiologic studies.

REPORTER'S CERTIFICATE

I, JULIANA F. ZAJICEK, C.S.R. No. 84-2604, a Certified Shorthand Reporter, do hereby certify:

That previous to the commencement of the examination of the witness herein, the witness was duly sworn to testify the whole truth concerning the matters herein;

That the foregoing deposition transcript was reported stenographically by me, was thereafter reduced to typewriting under my personal direction and constitutes a true record of the testimony given and the proceedings had;

That the said deposition was taken before me at the time and place specified;

That I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action.

IN WITNESS WHEREOF, I do hereunto set my hand on this 15th day of December, 2013.

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JULIANA F. ZAJICEK, Certified Reporter